



GEORGIA M. PESTANA  
*Acting Corporation Counsel*

THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, N.Y. 10007

COREY S. SHOOCK  
*Senior Counsel*  
phone: (212) 356-5051  
cshoock@law.nyc.gov

September 13, 2019

**BY ECF**

Honorable Vera M. Scanlon  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Kenneth V. Iacone, Sr. v. 123<sup>rd</sup> Precinct, et al.  
19 Civ. 3859 (KAM) (VMS)

Your Honor:

I am a Senior Counsel in the Office of Georgia M. Pestana, Acting Corporation Counsel of the City of New York, and the attorney assigned to the above-referenced case. This Office writes in response to the Court's Order dated July 30, 2019.

Plaintiff brings this action pursuant to 42 U.S.C. § 1983, alleging that on October 31, 2018, he was falsely arrested by officers assigned to the 123<sup>rd</sup> Precinct of the New York City Police Department (“NYPD”) following a traffic stop of a vehicle in which Plaintiff was a passenger. (ECF No. 1.) In the caption of the Complaint, Plaintiff lists two John Doe “arresting” officers whom he believes were involved in his arrest.

The Court's Order, pursuant to Valentin v. Dinkins, 121 F.3d 72 (2d Cir. 1997), requested that this Office ascertain the full name and address for service of process for the John or Jane Doe “arresting officers” allegedly involved in the incident. The NYPD arrest paperwork we have received to date indicates that Plaintiff's arresting officer on October 31, 2019 was Police Officer Cuadros. According to 123<sup>rd</sup> Precinct roll call for October 31, 2018, Officer Cuadros was assigned to an anti-crime team along with Police Officer Zielinski and three other members of service. Upon information and belief, Officer Cuadros may have “partnered” with Officer Zielinski at the time of the incident. We have no further information at this time to know what involvement, if any, Officer Zielinski had in Plaintiff's arrest. This Office will continue its investigation.

Therefore, pursuant to the Court's Order on July 30, 2019 and Valentin v. Dinkins, 121 F.3d 72 (2d Cir. 1997), this Office provides the proper service address of the assigned arresting officer for Plaintiff's arrest on October 31, 2018, as follows:

Police Officer Cuadros  
Shield No. 20548  
New York City Police Department  
123<sup>rd</sup> Precinct  
116 Main Street  
Staten Island, New York 10307

Likewise, this Office provides the proper service address of Officer Zielinski as follows:

Police Officer Zielinski  
Shield No. 12893  
New York City Police Department  
123<sup>rd</sup> Precinct  
116 Main Street  
Staten Island, New York 10307

This Office thanks the Court for its attention to this matter.

Respectfully submitted,

  
Corey S. Shoock  
Senior Counsel  
Special Federal Litigation Division

cc: **BY FIRST-CLASS MAIL**

Kenneth V. Iacone, Sr.  
*Plaintiff Pro Se*  
MC #154549  
Middlesex County Adult  
Corrections Center  
PO Box 266  
New Brunswick, New Jersey 08903